

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**VIDEO GAMING TECHNOLOGIES, INC.’S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS TO CASTLE HILL GAMING**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff Video Gaming Technologies, Inc. serves the following requests for the production of documents and things on Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC. VGT requests that Defendants provide responses to each request and produce the documents and things sought for inspection and copying at the office of VGT’s counsel, Covington & Burling LLP, One CityCenter, 850 Tenth Street, NW, Washington, DC, 20001 or at a place mutually agreeable to the parties, within the time prescribed by the Federal Rules of Civil Procedure and the Local Rules of this Court.

DEFINITIONS

Unless the terms of a request specifically indicate otherwise, the following definitions are applicable throughout these requests and are incorporated into each request.

REQUEST FOR PRODUCTION NO. 37:

All Documents and Things referring or relating to any comparison between VGT and CHG, including similarities or differences in their Marks, Trade Dress, or products.

REQUEST FOR PRODUCTION NO. 38:

All Documents and Things referring or relating to CHG's knowledge of VGT, the VGT Marks, the VGT Trade Dress, the VGT Trade Secrets, and VGT's products.

REQUEST FOR PRODUCTION NO. 39:

All Documents and Things sufficient to show, on a quarterly basis, the revenues of each of the Accused Games sold or leased from the date of first use to present.

REQUEST FOR PRODUCTION NO. 40:

All Documents and Things sufficient to show, on a quarterly basis, the gross and net profits realized by CHG, directly or indirectly, for each of the Accused Games sold or leased from the date of first use to present.

REQUEST FOR PRODUCTION NO. 41:

All Documents and Things sufficient to show, on a quarterly basis, CHG's gross and nets profits since CHG began operating.

REQUEST FOR PRODUCTION NO. 42:

All Documents and Things sufficient to show a comparison of CHG's profitability between its Accused Games and its non-Accused Games.

REQUEST FOR PRODUCTION NO. 43:

All Documents and Things sufficient to show the number of units of each of the Accused Games in operation by month and year and the names and locations of the casinos where the units are or were operating.

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2017, I sent via email, and on September 26, 2017, I deposited for mailing in the U.S. Mail, a true and correct copy of the foregoing VIDEO GAMING TECHNOLOGIES, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO CASTLE HILL GAMING to Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC, postage prepaid and addressed to the following:

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*Attorneys for Defendants Castle Hill
Studios LLC, Castle Hill Holdings LLC,
and Ironworks Development LLC*

/s/ Boniface Echols